

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

Claudia Balcerro Giraldo, *et al.*,

Plaintiffs,

V.

Drummond Company, Inc., et al.,

Defendants.

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Case No. 2:09-cv-1041-RDP

DECLARATION OF SARA E. KROPF

I, Sara E. Kropf, hereby declare as follows:

1. I am a partner in the law firm of Baker Botts, L.L.P. and an attorney for defendants Drummond Company, Inc. and Drummond Ltd. I submit this declaration in support of Defendants' Statement in Opposition to Plaintiffs' Request for Continuance of the Trial Date. This declaration is based on my personal knowledge.

2. After defendants' initial disclosures in October 2010, defendants have made multiple productions of documents to plaintiffs. Defendants produced documents to the plaintiffs in December 2010, February 2011, March 2011, April 2011, June 2011, August 2011 and September 1, 2011. There were four separate productions in March 2011. By April 4, 2011, defendants had produced over

62,000 pages of documents to the plaintiffs. In total, defendants have produced approximately 205,000 pages of responsive documents to plaintiffs.

3. A true and accurate copy of letter from Terry Collingsworth to Sara Kropf dated January 24, 2011, is attached as Exhibit 1.

4. A true and accurate copy of a letter from Sara Kropf to Terry Collingsworth dated January 28, 2011 is attached as Exhibit 2.

5. A true and accurate copy of a letter from Sara Kropf to Terry Collingsworth dated February 8, 2011, is attached as Exhibit 3.

6. A true and accurate copy of an exchange of emails between Sara Kropf and Terry Collingsworth dated February 4 and 8, 2011, is attached as Exhibit 4.

7. A true and accurate copy of a letter from Sara Kropf to Terry Collingsworth dated April 26, 2011, is attached as Exhibit 5.

8. A true and correct copy of a letter from Sara Kropf to Terry Collingsworth dated June 24, 2011, is attached as Exhibit 6.

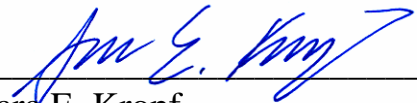
9. A true and correct copy of a letter from Bill Jeffress to Terry Collingsworth dated March 10, 2011, is attached as Exhibit 7.

10. I have reviewed the email and letter correspondence between plaintiffs' counsel and defense counsel with respect to the structure, scheduling and logistics of the depositions in Colombian prisons. There are over 25 such emails and letters

exchanged between the parties related to discussion and negotiation of these issues between November 2010 and June 2011.

I hereby state under penalty of perjury that the statements above are true and correct.

Date: September 7, 2011



Sara E. Kropf